

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TECSPEC LLC, RICHARD ROSE, ROBERT SENIA,  
and RALPH SCHLENKER,

Plaintiffs,

- against -

MICHAEL DONNOLO, JOSHUA DONNOLO,  
JOHN MICHAEL LONG, BRAYA CONCEPTS  
LLC, BRAYA MACHINE COMPANY LLC,  
BRAYA SYSTEMS LLC, BRAYA VENTURES  
LLC, ABC CORPORATIONS 1-10,

Defendants.

Case No. 1:24-cv-08077-JHR

**DECLARATION OF KEVIN  
KERR**

**Kevin Kerr**, states the following as true and accurate, under penalty of perjury:

1. I am a non-party witness, as such, submit the following which I know to be true on my own personal knowledge.
2. I submit the following in opposition to Plaintiffs' motion seeking a temporary restraining order and preliminary injunction ("Plaintiffs' Motion").
3. On or about June 11, 2024, Plaintiff Rich Rose disclosed that "he knew Mike was competing with [Tecspeg]".

**DECLARATION**

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 28, 2024.

Kevin Kerr

A handwritten signature in black ink, appearing to be 'Kerr', is written over a horizontal line.